

**MATTHEW J. KLUGER**  
ATTORNEY AT LAW


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888 GRAND CONCOURSE, SUITE 1H  
BRONX, NEW YORK 10451  
(718) 293-4900 • FAX (718) 618-0140  
www.klugerlawfirm.com

March 15, 2022

By ECF

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 03/16/22

The sentencing scheduled for March 24, 2022 is hereby  
adjourned to April 26, 2022 at 11:00 AM.

**Re: United States v. Franklin Mejia Martinez**  
**21 Cr. 408 (VSB)**

Dear Judge Broderick,

Mr. Mejia-Martinez is scheduled to be sentenced on March 24, 2022, at 10:00 a.m. Defense counsel is currently on trial in the matter of People v. Delosangeles (#2681-2017) in Bronx Supreme Court, Part 29, before the Honorable Jeanette Rodriguez-Morick. It is anticipated that this homicide trial will conclude sometime during the week of March 21, 2022. Given that I have been on trial for the last two weeks, I have been unable to file the defense sentencing submission in this matter and meet with Mr. Mejia-Martinez to prepare for sentencing.

Accordingly, I respectfully request that Mr. Mejia-Martinez's sentencing be adjourned for 30-days to allow the defense additional time to properly prepare for sentencing. I have discussed the above with AUSA Rebecca Dell who has *no objection* to this request on behalf of the Government.

Thank you.

Respectfully Submitted,

/s/ Matthew J. Kluger  
Matthew J. Kluger, Esq.

cc: AUSA Rebecca T. Dell